

**HEARING DATE AND TIME: April 8, 2015 at 10:00 a.m. (Eastern Time)**  
**OBJECTION DEADLINE: March 30, 2014 at 4:00 p.m. (Eastern Time)**

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*Attorneys for Natixis and Natixis Financial Products Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re : Chapter 11 Case No.  
: :  
LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)  
: :  
Debtors. : (Jointly Administered)  
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**JOINDER OF NATIXIS AND NATIXIS FINANCIAL PRODUCTS INC. TO THE  
OBJECTION OF CITADEL ENERGY INVESTMENTS LTD. AND CITADEL EQUITY  
FUND LTD. TO THE MOTION TO ALLOW DISCLOSURE OF THE DERIVATIVE  
QUESTIONNAIRES PURSUANT TO SECTION 107(a) OF THE BANKRUPTCY CODE**

Natixis and Natixis Financial Products Inc., by and through their undersigned counsel, hereby join in the objections of Citadel Energy Investments Ltd. and Citadel Equity Fund Ltd. (the “Citadel Objection to the Motion”) filed to the Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code (the “Motion”), as follows:

**OBJECTION AND JOINDER**

Ech of Natixis and Natixis Financial Products Inc. and the Debtors were parties to certain derivative contracts.

1. Natixis and Natixis Financial Products Inc. hereby join and incorporate by reference the arguments, in their entirety, made by Citadel Energy Investments Ltd. and Citadel Equity Master Fund Ltd. in the Citadel Objection to the Motion [Docket 49030].

WHEREFORE, for the foregoing reasons, Natixis and Natixis Financial Products Inc. respectfully request that this Court deny the Debtors' Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code, and, alternatively, if the Court grants the Motion, direct Debtors to redact all identifying, confidential and proprietary information from any documents disclosed, including any negotiated agreement such as any ISDA Master Agreements and any Guarantees, and grant such other, further or different relief as this Court deems just and proper.

Dated: New York, New York  
March 30, 2015

SCHLAM STONE & DOLAN LLP

By: s/ Bennette D. Kramer

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